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April 25, 1990

Ms. Beth Feeley  
U.S. EPA Region 10  
1200 Sixth Avenue (HW-113)  
Seattle, WA 98101

Subject: EPA Contract 68-W9-0008, W.A. C10010  
Bunker Hill RI/FS Oversight  
1989 Bunker Hill Smelter Complex Administrative Unilateral Order

Dear MS Feeley:

SAIC has completed our review of the letter submitted by Gulf Resources and Chemical Corporation with the Asbestos Removal and PCB Management Plans required by the 1989 Unilateral Order.

Our concerns are related to:

- Section II Asbestos Removal Plan, Part B, paragraph 1; "Asbestos conditions in the smelter complex, including, among other areas, the Lead Smelter and Zinc Plant areas, currently are being evaluated by Gulf, pursuant to an Administrative Order of Consent, in the comprehensive nonresidential areas RI/FS.<sup>4</sup>"
- Section III PCB Management and Disposal Plan, Part B, paragraph 2; "Moreover, like asbestos conditions, long-range concerns as to PCBs currently are being evaluated in the ongoing RI/FS process, in which a comprehensive evaluation of PCB-related data and appropriate remedial measures will be conducted.<sup>16</sup>"

These sections are referenced in Footnotes 4 and 16, respectively, to "Task 8" of the RI/FS. The Draft Task 8 DER was issued to EPA on March 27, 1990. Based on our preliminary review of the content of the Task 8 DER, we do not feel that asbestos and PCB conditions are adequately addressed. Consequently, these sections of the Removal and Management Plan presented by Gulf are not adequately supported.

Should you have any questions, please contact me.

Sincerely,

Elaine J. Hanford  
Senior Geologist  
Bunker Hill Project Coordinator

cc: M. Slater, EPA RPO  
S. Martyn, EPA  
T. Tobin, SAIC

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